

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

CIRCUIT CIVIL DIVISION

CASE NO.: 50-2015 CA 002369 AN

EDMUNDO PEREZ, as Personal
Representative of the Estate of
ASHLEY PEREZ, deceased, on behalf
of the Estate of ASHLEY PEREZ and
the lawful survivors of the Decedent,
To Wit: AMALIA PEREZ, as surviving
minor daughter, and DYLAN PEREZ, as
surviving minor son,

Plaintiffs,

vs.

WELLINGTON REGIONAL MEDICAL
CENTER, INC., individually and on behalf
of its agents, apparent agents, servants and
employees; ; ST. MARY'S MEDICAL
CENTER, INC. d/b/a ST. MARY'S MEDICAL
CENTER; JAMES JUSTIN GOAD, M.D.;
PALM BEACH GENERAL SURGERY d/b/a
THE CENTER FOR ADVANCED SURGICAL
CARE; WILLIAM JEFFREY DAVIS, D.O.;
PALM BEACH TRAUMA ASSOCIATES;
individually and on behalf of its partners, agents,
apparent agents, servants and employees; ROBERT
BORREGO, M.D., P.A.; independently and as general
partner of PALM BEACH TRAUMA
ASSOCIATES; AHMED EL-HADDAD, M.D.,
P.A.; DIMITER B. HRISTOV, M.D., P.A.;
independently and as general partner of
PALM BEACH TRAUMA ASSOCIATES;
RAYMOND HENDERSON, SR., M.D.; and
RAYMOND HENDERSON, SR., M.D., P.A.;

Defendants.

_____ /

EXPERT WITNESS LIST

COMES NOW, Defendants, JAMES JUSTIN GOAD, M.D. and PAL BEACH GENERAL SURGERY d/b/a THE CENTER FOR ADVANCED SURGICAL CARE, through counsel, in accordance with this Court's Order dated June 7, 2017, hereby files its Disclosure of Expert Witnesses, as follows:

EXPERT WITNESSES

1. Arnold W. Cohen, M.D. – OB/GYN
Albert Einstein Medical Center
5501 Old York Road
Philadelphia, PA 19141

Dr. Cohen will testify concerning the standard of care, causation and damages. He is of the opinion that the care and treatment rendered by the non-party Fabre defendant, Berto Lopez, M.D. was inappropriate and the sole contributory cause of the death of Ashley Perez. His testimony will be based upon the various depositions, medical records, and other discovery taken in this matter, as well as his training and experience.

2. Shelley Marks, M.D. – General Surgeon
23 Presidio Avenue
San Francisco, CA 94115

Dr. Marks will testify concerning the standard of care, causation and damages. She is of the opinion that the care and treatment rendered by the non-party Fabre defendant, Berto Lopez, M.D. was inappropriate. She is of the opinion that Dr. Lopez's deviation in care caused Ashley Perez's death. Dr. Lopez was the sole cause of the death of Mrs. Perez. Her testimony will be based upon the various depositions, medical records, and other discovery taken in this matter, as well as her training and experience.

3. Aytakin Oto, M.D. – Abdominal Radiologist
The University of Chicago
5841 South Maryland Avenue
Chicago, Illinois 60637

Dr. Oto will testify regarding his findings on the films, his review of the medical records, deposition testimony, other discovery taken in this matter, as well as his training and experience. It is anticipated that he will opine that, based upon the radiographic imaging, there was no basis to assume Mrs. Perez had a ruptured liver.

4. Defendant reserves the right to amend its disclosure as discovery is ongoing.

Certificate of Service

I certify that a copy hereof has been furnished to the attorneys listed on the attached service list, by e-mail, on August 16th, 2017.

**FALK, WAAS, HERNANDEZ, CORTINA,
SOLOMON & BONNER, P.A.**

135 San Lorenzo Avenue, Suite 500

Coral Gables, Florida 33146

(305) 447-6500

Fax: (305) 447-1777

SOP: servicessolomon@falkwaas.com

By: _____

Scott E. Solomon

Florida Bar No.: 993069

**ASHLEY PEREZ, DECEASED VS. JAMES J. GOAD, M.D., ET AL.
OUR FILE NO.: 1053-9751**

Attorney for Plaintiffs

Adam Hecht, Esquire
Searcy, Denney, et.al.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
(561) 686-6300
SOP:
hechtteam@searcylaw.com
ahecht@searcylaw.com
nbullard@searcylaw.com

Attorney for St. Mary's Medical Ctr/Davis:

Bruce Ramsey, Esquire
Billing, Cochran, Lyles, Mauro
& Ramsey, P.A.
1601 Forum Place, Suite 400
West Palm Beach, FL 33401
SOP: wpb-pleadings@bclmr.com
MarthaL@bclmr.com

Attorneys for Wellington Reg.:

Jeffrey L. Blostein, Esquire
One Financial Plaza, Suite 1500
100 SE Third Avenue
Ft. Lauderdale, FL 33394
(954) 763-6093
SOP: pleadings@jaycohenlaw.com
sbaker@jaycohenlaw.com

Attorney for Goad/Palm Beach Gen.

Surgery

Scott E. Solomon, Esquire
Falk, Waas, Hernandez, et.al.
135 San Lorenzo Avenue
Coral Gables, Florida 33134
(305) 447-6500
Fax: (305) 447-1777
SOP: servicessolomon@falkwaas.com

Attorneys for Hristov/Haddad

Keith J. Puya, Esquire
Law Offices of Keith J. Puya, P.A.
4880 Donald Ross Road, Suite 225
Palm Beach Gardens, Florida 33418
(561) 408-3772
SOP: eservice@puyalaw.com
legalassistant3@puyalaw.com

Attorneys for R. Henderson MD

Jonathan P. Lynn, Esquire
Chimpoulis, Hunter & Lynn, P.A.
150 S. Pine Island Road, Suite 510
Plantation, Florida 33324
(954) 463-0033
SOP: jlynn@chi-law.com;
cmallard@chi-law.com